

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD, et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 4:17-cv-2455 CDP
)	
CITY OF ST. LOUIS, MISSOURI,)	
)	
Defendant.)	

Consent Motion for Extension of Time to File Response

Plaintiffs move for a ten-day extension of time, from April 5, 2019 to April 15, 2019, in which to file their response to Defendant's Motion to Dissolve Preliminary Injunction and Dismiss, ECF No. 126. In support, they state:

1. On March 29, 2019, Defendant filed a Motion to Dissolve Preliminary Injunction and Dismiss, ECF No. 126.
2. The motion was accompanied by a motion to exceed page limitations, which was granted on April 1, 2019, ECF No. 134, permitting Defendant to file a thirty-nine page memorandum in support of the Motion to Dissolve Preliminary Injunction and Dismiss, ECF No. 135.
3. The Motion to Dissolve Preliminary Injunction and Dismiss includes thirty-seven exhibits, which includes more than 1,300 pages of documents. The exhibits also include two flash drives, three DVDs, and an external drive that contain lengthy videos.
4. Plaintiffs' response to a motion of this nature is due on April 5, 2019.

5. Because of the volume of material filed by Defendant, Plaintiffs require additional time to file their response.
6. In addition, Plaintiff need additional time because of the press of other business, including previously scheduled depositions in this case. These include the depositions of Dustin Boone on April 5, Sisavath Signharath on April 8, City of St. Louis (pursuant to Federal Rule of Civil Procedure 30(b)(6)) on April 8, Lyda Krewson on April 9, Justin Johnson on April 9, Joe Calabro on April 10, Mike Deebea on April 11, and Joe Lankford on April 12.
7. No prejudice will befall Defendant by grant of this motion. The preliminary injunction was entered on November 15, 2017, ECF No. 58—499 days before Defendants’ Motion to Dissolve Preliminary Injunction and Dismiss— so any brief delay in resolution of Defendant’s request that the injunction be dissolved is of little harm. Moreover, discovery concludes on April 29, 2019, ECF No. 81, so, with or without the extension, resolution of Defendant’s request that this case be dismissed will not avoid or minimize the conduct of discovery.
8. Defendant consents to this request for an extension of time.

WHEREFORE Plaintiffs move for an extension of time through April 15, 2019 to file their response to Defendant’s Motion to Dissolve Preliminary Injunction and Dismiss.

Respectfully submitted,

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